

EXHIBIT C



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 15, 2020

BY ECF & EMAIL

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Souleymane Balde*, 20 Cr. 281 (KPF)

Dear Judge Failla:

The Government respectfully submits this letter in response to defendant Souleymane Balde's letter dated June 15, 2020. (*See* Dkt. No. 18.) The Government respectfully requests that, in the first instance, the Government speak with the Jury Administrator without defense counsel on the line. The purpose of the call is for the Government to understand the various items requested by the defendant (the "Requested Items"). The Government expects that defense counsel – and its expert – is already familiar with the Requested Items, having made the request in the first place. Additionally, given that multiple defendants have filed identical motions in other cases, the Government seeks to streamline the call by limiting the participants on the call. *See United States v. Baker, et al.*, 20 Cr. 288 (LJL); *United States v. Henry*, 20 Cr. 293 (LJL); *United States v. Williams*, 20 Cr. 286 (WHP).


To the extent the Court is inclined to grant the defendant's request to participate in the call with the Jury Administrator, the Government respectfully requests the Court to limit the discussion to a general description of the Requested Items, and whether the Southern District of New York has the Requested Items, as opposed to a substantive discussion regarding the Requested Items. To simplify logistics, the Government further requests that one defense lawyer participate on behalf of the multiple defense lawyers who have made similar requests in other cases.

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Respectfully submitted,

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